

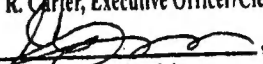
ORIGINAL

1 LUIS A. CARRILLO, Esq. SBN 70398  
2 MICHAEL S. CARRILLO, Esq. SBN 258878  
3 CARRILLO LAW FIRM, LLP  
4 1499 Huntington Drive, Suite 402  
5 South Pasadena, CA 91030  
6 Tel: (626) 799-9375  
7 Fax: (626) 799-9380

8 Attorneys for Plaintiff  
9 JANE MBQ DOE, a minor, by and through her Guardian  
10 ad Litem, Rosalba G.;

**FILED**  
Superior Court of California  
County of Los Angeles

MAY 02 2018

Sherri R. Carter, Executive Officer/Clerk of Court  
By , Deputy  
Gloria Robinson

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **IN AND FOR THE COUNTY OF LOS ANGELES**

BC 7 04 465

13 JANE MBQ DOE, a minor, by and through her )  
14 Guardian ad Litem, Rosalba G.; )

CASE NO:

15 **PLAINTIFF**

**COMPLAINT FOR DAMAGES FOR:**

16 v.

- 17 1. Negligence  
18 2. Negligent Infliction of Emotional Distress  
19 3. Violation of Ralph Act, Civil Code § 51.7  
20 4. Violation of Bane Act, Civil Code § 52.1

21 CITY OF LOS ANGELES, a public entity; and )  
22 DOES 1 THROUGH 10, INCLUSIVE )

**[DEMAND FOR JURY TRIAL]**

23 **DEFENDANTS**

24 **COMPLAINT**

25 Plaintiff JANE MBQ DOE, a minor by and through her Guardian ad Litem, Rosalba G.,  
26 complains and alleges as follows:

27 **I.**

28 **VENUE AND JURISDICTION**

1. Venue is proper in the Superior Court of the State of California, for the County of Los Angeles in that the underlying acts, omissions, injuries and related facts and circumstances upon which the present action is based occurred in the County of Los Angeles, Los Angeles, California. This court has jurisdiction over the present matter because, as delineated within this complaint, the nature of the claims and amounts in controversy meet the requirements for jurisdiction in the Superior Court.

CIT/CASE: BC704465  
LEA/DEF#:

RECEIPT #: CCH505376094

DATE PAID: 05/02/18 12:50 PM

PAYMENT: \$435.00 310

RECEIVED:

CHECK: \$435.00

CASH: \$0.00

CHANGE: \$0.00

CARD: \$0.00

OSC: 10 / 16 / 2019 TRIAL: 11 / 04 / 2019 OSC: 05 / 03 / 2021

55/57

8102/70/50

**II.**  
**PARTIES**

2. At all times mentioned herein, Plaintiff JANE MBQ DOE was a resident of the County of Los Angeles, State of California. The name JANE MBQ DOE is not this Plaintiff's true name, it is a fictitious pseudonym utilized as privacy protection for the minor. This Plaintiff is a female, born on 04/26/2002 and was a minor during the entire time of the sexual misconduct alleged herein.

3. This Complaint is brought pursuant, but not limited, to California Government Code §815.2 and Code of Civil Procedure §340.1.

4. At all relevant times, Defendant CITY OF LOS ANGELES (hereinafter "CITY") is and was a municipal corporation existing under the laws of the State of California. Defendant CITY is a chartered subdivision of the State of California with the capacity to be sued. Defendant CITY is responsible for the actions, omissions, policies, procedures, practices, and customs of its various agents and agencies, including the Los Angeles Police Department (hereinafter "LAPD") and its agents and employees, including Los Angeles Police Department Officer Robert Cain (hereinafter "CAIN"). At all relevant times, Defendant CITY was responsible for assuring that the actions, omissions, policies, procedures, practices, and customs of the LAPD, and its Officers, employees and agents, complied with the laws of the United States and of the State of California. Defendant CITY was responsible for assuring that the actions, omissions, procedures, and practices, of its Police Officers complied with POST training standards regarding proper police tactics.

5. At all relevant times, ROBERT CAIN was a duly appointed CITY of Los Angeles Police Officer and an employee or agent of CITY, subject to oversight and supervision by CITY's elected and non-elected officials, and he acted under color of law, to wit, under the color of the statutes, ordinances, regulations, policies, customs, and usages of defendant CITY, the LAPD, and under the color of the statutes and regulations of the State of California. Plaintiff alleges that the Defendant CITY is vicariously liable under the theory of respondeat superior, for the acts of ROBERT CAIN, and DOES 1-10. Defendant CITY is liable for its own acts and negligence; and the negligent conduct of CAIN was a result of the negligent employment, negligent supervision, negligent retention, and negligent training, by the Defendant CITY OF LOS ANGELES.

1           6.       At all relevant times, Defendants, DOES 1 through 10, were duly appointed CITY Police  
2 Officers and/or employees or agents of CITY, subject to oversight and supervision by CITY's elected  
3 and non-elected officials and/or managerial, supervisory or policy-making officials of the City of Los  
4 Angeles Police Department. At all times relevant, DOES 1 through 10 acted under the color of law, to  
5 wit, under the color of the statutes, ordinances, regulations, policies, customs, and usages of Defendant  
6 CITY, in the LAPD, and under the color of the statutes and regulations of the State of California.

7           7.       At all relevant times, Defendants, DOES 1 through 10, were specifically authorized by  
8 Defendant CITY OF LOS ANGELES to perform the duties and responsibilities of sworn officers and law  
9 enforcement officers of the LAPD, and all acts hereinafter complained of were performed by each DOE  
10 defendant within the course and scope of their duties as law enforcement Officers for Defendant CITY  
11 OF LOS ANGELES. Defendants DOES 1 through 10 are also sued herein in their individual capacity and  
12 in their official capacity as police officers of the LAPD, and the CITY OF LOS ANGELES. Defendant  
13 CITY assisted, ratified and/or acquiesced in the negligent and intentional acts and omissions of ROBERT  
14 CAIN and DOES 1-10.

15           8.       The present Plaintiff is ignorant of the true names and capacities of Defendants sued  
16 herein as DOES 1 through 10, and therefore sues these defendants by such fictitious names. Plaintiff will  
17 amend this complaint to allege said defendants' true names and capacities when ascertained. Plaintiff  
18 JANE MBQ DOE is informed and believes and thereon alleges that each of the fictitiously named  
19 defendants are responsible in some manner for the occurrences herein alleged, and that Plaintiff's injuries  
20 as herein alleged were proximately caused by the acts and/or omissions of said fictitiously named  
21 defendants.

22           9.       At all times mentioned herein, each and every defendant was the agent of each and every  
23 other defendant and had the legal duty to oversee and supervise the hiring, conduct, and employment of  
24 each and every defendant.

25           10.      All of the acts complained of herein by Plaintiff against Defendants were done and  
26 performed by said Defendants by and through their authorized agents, servants, and/or employees, all of  
27 whom at all relevant times herein were acting within the course, purpose, and scope of said agency,  
28 service, and/or employment capacity. Moreover, Defendants and their agents ratified all of the acts  
complained of herein.

11. On or about October 27, 2017, pursuant to Government Code Section 900, Plaintiff JANE MBQ DOE presented a claim with the City of Los Angeles in full and timely compliance with the California Tort Claim Act.

12. On or about November 6, 2017, the City of Los Angeles rejected Plaintiff, JANE MBQ DOE's Claim. Plaintiff has therefore exhausted all administrative remedies.

### III.

**FACTS COMMON TO ALL CAUSES OF ACTION**

13. Plaintiff re-alleges and incorporates by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

14. At all times relevant, Plaintiff JANE MBQ DOE was in the Los Angeles Police Department Cadet Program at the 77<sup>th</sup> Street Division of the Los Angeles Police Department between January, 2017 and June, 2017, including June 14, 2017, under the care, control, and/or supervision of, the LOS ANGELES POLICE DEPARTMENT, and DOES 1 to 10.

15. At all times relevant, ROBERT CAIN was employed by the CITY OF LOS ANGELES and the LOS ANGELES POLICE DEPARTMENT as a Police Officer, Cadet Program Advisor and mentor. In such capacities, CAIN was under the direct supervision, employ, agency and/or control of the CITY and the LAPD, and DOES 1 to 10. CAIN's employment duties and responsibilities with the Defendant CITY and DOES 1-10 included, inter alia, providing of the supervision, advisory, education, and training needs and well-being of minor Cadets participating in the Los Angeles Police Department Cadet Program at the 77<sup>th</sup> Street Division of the Los Angeles Police Department, including Plaintiff JANE MBO DOE.

16. By hiring and/or employing CAIN to serve as a Cadet Advisor, the CITY OF LOS ANGELES and the LOS ANGELES POLICE DEPARTMENT, held out to JANE MBQ DOE, her mother, and the public that CAIN was of high ethical and/or moral repute, and to be in good standing with the LAPD, the County of Los Angeles, the State of California and the public.

17. Through his position with the CITY and the LAPD, CAIN was put into direct contact with JANE MBQ DOE, an LAPD Cadet. CAIN was assigned to supervise, train, and advise Plaintiff JANE MBQ DOE. It is under these circumstances that JANE MBQ DOE came to be under the direction and

1 control of CAIN, who used his position of authority and trust over JANE MBQ DOE to “groom” and  
2 sexually molest and sexually abuse Plaintiff.

3 18. Plaintiff JANE MBQ DOE was under the supervision of Los Angeles Police Officer,  
4 ROBERT CAIN, between January, 2017 and June, 2017, including June 14, 2017, CAIN, caused injuries  
5 and damages to the minor Plaintiff JANE MBQ DOE while acting under color of law as a Police Officer  
6 for Defendant, CITY OF LOS ANGELES.

7 19. On or about January, 2017 through June, 2017, including June 14, 2017, Defendant CITY  
8 and DOES 1-10 negligently supervised Los Angeles Police Department Officer ROBERT CAIN.  
9 Defendant CITY and DOES 1-10 negligently permitted CAIN to have unsupervised contact with Plaintiff  
10 JANE MBQ DOE. CAIN; negligently permitted CAIN to “groom” Plaintiff; and negligently permitted  
11 CAIN TO sexually abuse Plaintiff; and negligently permitted CAIN to coerce Plaintiff and commit lewd  
12 acts upon the minor Plaintiff JANE MBQ DOE. Defendant CITY and DOES 1-10 negligently permitted  
13 CAIN to sexually harass and sexually assault Plaintiff. As a result of the negligent supervision by  
14 Defendant, CITY and DOES 1-10, Officer CAIN committed sexual assaults and lewd acts upon JANE  
15 MBQ DOE.

16 20. On or about January, 2017 through June 2017, including June 14, 2017, Plaintiff JANE  
17 MBQ DOE, a minor, was “groomed,” seduced, coerced, and tricked by CAIN. Officer CAIN had been  
18 “grooming” Plaintiff by taking her to places such as Magic Mountain, pretending that he was her friend,  
19 giving her gifts, and sending her inappropriate text messages.

20 21. Los Angeles Police Department Officer CAIN committed lewd acts upon the minor  
21 Plaintiff for his sexual gratification for his sexual appetite. Plaintiff JANE MBQ DOE was deprived of  
22 her legal rights protected by the Constitution and laws of the United States and the State of California.  
23 Defendant CITY and LAPD Officer CAIN violated the rights of Plaintiff JANE MBQ DOE not to be  
24 subjected to sexual abuse, sexual molestation, sexual harassment, sexual assault, and lewd acts.

25 22. CAIN did sexually assault and commit lewd acts upon JANE MBQ DOE, who was a  
26 minor at the time. Such conduct was done solely for CAIN’s sexual gratification, and was performed on  
27 JANE MBQ DOE without her free consent, as JANE MBQ DOE was a minor and thus unable to give  
28 valid legal consent to such sexual acts.

1           23.     JANE MBQ DOE is informed and alleges that the lewd acts upon her constituted conduct  
2 in violation California Penal Code § 288a(b)(2), § 288a(b)(2), § 288(c)(1) and other Penal Code sections.

3           24.     Defendant CITY and its employees and agents, including but not limited to DOES 1  
4 through 10, failed to take reasonable steps and/or implement reasonable safeguards, to prevent the sexual,  
5 lewd and lascivious acts committed by CAIN, including preventing the sexual abuse of JANE MBQ  
6 DOE by CAIN. Defendant CITY and DOES 1-10 negligently placed CAIN in a job duty and  
7 environment in which contact with minor children, such as Plaintiff was an inherent part of that job duty  
8 and environment. Instead, Defendant CITY and DOES - 10, ignored and/or "covered up" the sexual  
9 abuse of Plaintiff JANE MBQ DOE. Defendant City and DOES 1 to 10, negligently failed to properly  
10 supervise CAIN; and negligently failed to properly supervise Plaintiff which resulted in Plaintiff being  
11 sexually abused by CAIN.

12           25.     Prior to and during the sexual abuse and assault of Plaintiff JANE MBQ DOE, Defendant  
13 CITY and DOES 1 through 10, knew or should have known that CAIN violated his role as a police  
14 officer, advisor, training Officer, and/or mentor, and CAIN used his position of authority and trust, acting  
15 on behalf of the CITY and the LAPD, to have unsupervised access to minor children, including Plaintiff,  
16 in which the Defendants allowed CAIN to physically touch Plaintiff in a sexual manner, and engage in  
17 lewd and lascivious acts, and sexual assaults of Plaintiff JANE MBQ DOE. The Defendants, and each of  
18 them, failed to take reasonable steps and implement reasonable safeguards to avoid and/or prevent the  
19 unlawful sexual conduct alleged in this complaint by CAIN, which allowed CAIN to violate Plaintiff and  
20 commit lewd acts and sexual assaults upon Plaintiff.

21           26.     Defendant CITY and DOES 1 through 10, knew or should have known that CAIN had  
22 previously been the subject of a personnel complaint in the Van Nuys Division; and that due to CAIN's  
23 conduct, CAIN was transferred to the 77<sup>th</sup> division of the Los Angeles Police Department in 2015.  
24 Despite have knowledge of CAIN's problematic conduct while at the Van Nuys Division, the CITY and  
25 DOES 1 through 10 continued to retain CAIN as a LAPD Police Officer and Cadet Advisor.

26           27.     Plaintiff JANE MBQ DOE further alleges that Defendant CITY and DOES 1 through 10,  
27 failed to report to Child Protective Services the sexual abuse of Plaintiff; and CITY and DOES 1 - 10 did  
28 hide and conceal from the minor Cadets, parents, the community and Child Protective Services, the true



1 facts and evidence necessary to bring CAIN to justice for the sexual assaults CAIN committed with  
2 minors, such as minor Cadets under their care, including Plaintiff.

3 **FIRST CLAIM FOR RELIEF**

4 **Negligence (Cal. Govt. Code § 815.2 and California Common Law)**

5 (Against All Defendants)

6 28. Plaintiff re-alleges and incorporates by reference herein each and every allegation  
7 contained herein above as though fully set forth and brought in this cause of action.

8 29. On or about January, 2017 through June, 2017, including June 14, 2017, Defendant CITY  
9 OF LOS ANGELES and DOES 1-10 negligently supervised Los Angeles Police Department Officer,  
10 ROBERT CAIN; and negligently supervised Plaintiff JANE MBQ DOE. The negligent supervision by  
11 Defendant CITY OF LOS ANGELES and DOES 1-10 empowered CAIN to “groom” and sexually abuse  
12 Plaintiff; and CAIN did “groom” and CAIN unlawfully seduced Plaintiff. Because of the negligent  
13 supervision of the CITY OF LOS ANGELES and DOES 1-10, CAIN committed lewd and lascivious acts  
14 upon Plaintiff. The negligent supervision of Defendant CITY and DOES 1-10 was the proximate cause of  
15 CAIN committing sexual acts, and lewd and lascivious acts, upon Plaintiff.

16 30. The intentional and negligent conduct of Officer CAIN was a result of the negligent  
17 employment, negligent supervision, negligent retention, and negligent training, by the Defendant CITY  
18 OF LOS ANGELES and DOES 1-10. Defendant CITY has been negligent in the training of City of Los  
19 Angeles Police Officers, including Officer CAIN, regarding proper police practices; regarding POST  
20 code of conduct for police officers; regarding sexual harassment policies. The Defendant CITY and  
21 DOES 1-10 failed to train LAPD officers, including Officer CAIN, that inappropriate conduct with  
22 minors enrolled in the Los Angeles Police cadet program was against State and Federal Law, and against  
23 POST training standards. Peace Officer Standards and Training (POST) was established by the California  
24 Legislature in 1959 to set minimum selection and training standards for California law enforcement  
25 officers.

26 31. The CITY OF LOS ANGELES and, LOS ANGELES POLICE DEPARTMENT, and  
27 DOES 1 through 10, failed to protect Plaintiff JANE MBQ DOE from criminal acts of LAPD officers;  
28 negligently failed to provide safe and secure premises for Plaintiff JANE MBQ DOE; and negligently



1 failed to protect the Los Angeles Police Department Cadets, including Plaintiff JANE MBQ DOE from  
2 sexual abuse by LAPD police officers and cadet advisors.

3 32. The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT, and  
4 DOES 1 through 10, negligently supervised the Cadet Program at 77<sup>th</sup> Street Division. The CITY, the  
5 LAPD, and DOES 1 through 10, knew, or should have known about its police officers' potential danger  
6 to sexually abuse Los Angeles Police Department Cadets before Plaintiff JANE MBQ DOE was sexually  
7 abused by Officer CAIN. The CITY and DOES 1-10 allowed a culture to exist within the LAPD in which  
8 sexual acts upon Cadets by its Police Officers would be condoned and permitted at the 77<sup>th</sup> Street  
9 Division.

10 33. The CITY OF LOS ANGELES and DOES 1 through 10 had insufficient policies and  
11 procedures to ensure that minors in the Cadet program would not be left alone with police officers. The  
12 CITY and DOES 1 through 10 negligently failed to have safety policies and procedures to protect Los  
13 Angeles Police Department Cadets from sexual abuse by LAPD Officers. The CITY and DOES 1  
14 through 10 negligently failed to have safety policies and procedures to mandate that City of Los Angeles  
15 personnel report sexual abuse of the Cadets by police officers. The CITY and DOES 1 through 10  
16 negligently failed to have training for City of Los Angeles personnel and Los Angeles Police Department  
17 Officers to recognize the signs of sexual abuse; and to recognize "grooming" of minor Cadets by LAPD  
18 Officers, such as Officer CAIN herein.

19 34. While Officer CAIN "groomed" Plaintiff and sexually molested and sexually abused  
20 Plaintiff; the CITY and DOES 1 through 10 were aware, or should have been aware, that Officer CAIN  
21 took an unusual interest, and spent an inordinate amount of time with Plaintiff, as part of his "grooming" of  
22 Plaintiff.

23 35. The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT, and  
24 DOES 1 through 10, negligently employed, negligently retained, and negligently supervised Officer  
25 CAIN. The CITY and DOES 1 through 10, failed to adequately investigate Officer CAIN's background  
26 and qualifications before negligently hiring Officer CAIN. The CITY and DOES 1-10, negligently failed  
27 to conduct a reasonable investigation into Officer CAIN's background prior to hiring and/or allowing him to  
28 serve as a police officer and Cadet advisor for the Los Angeles Police Department.

1           36.     After hiring its police officers, such as Officer CAIN, the CITY and DOES 1 through 10,  
2 failed to adequately monitor and supervise its police officers, such as Officer CAIN, and negligently  
3 retained Officer CAIN as an employee of the City of Los Angeles. The CITY and DOES 1-10  
4 negligently employed, negligently retained, and negligently supervised Officer CAIN.

5           37.     The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT, and  
6 DOES 1 through 10, had special duties to protect minor Cadets and Plaintiff who was one of the Cadets  
7 within the Los Angeles Police Department Cadet Program. The CITY and DOES 1-10 were entrusted  
8 with the care of minor Cadets by their parents. The care, welfare, and physical safety of Plaintiff JANE  
9 MBQ DOE was entrusted to the CITY and DOES 1 through 10, who accepted the entrusted care of the  
10 minor Plaintiff. As such, the CITY, the LAPD, and DOES 1 through 10, owed Plaintiff a special duty of  
11 care, in addition to the duty of ordinary care, and owed Plaintiff a higher duty of care that adults dealing  
12 with children owe to protect children from harm. The duty to protect Plaintiff arose from the special,  
13 trusting, confidential, and fiduciary relationship between the CITY, DOES 1 through 10 and Plaintiff  
14 because the CITY and DOES 1-10 were entrusted to protect Plaintiff from harm and to protect Plaintiff  
15 from sexual abuse. Plaintiff JANE MBQ DOE instilled great trust, faith and confidence in the CITY and  
16 DOES 1-10, and in Officer CAIN who was training and advising Plaintiff.

17           38.     The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT, and  
18 DOES 1 through 10, breached their duties of care to Plaintiff JANE MBQ DOE by allowing CAIN to  
19 come into contact with Plaintiff without proper supervision; by allowing CAIN to "groom" Plaintiff; by  
20 failing to adequately supervise CAIN; by continuing to retain CAIN, who was permitted and enabled to  
21 have access to Plaintiff; by concealing from Plaintiff, her parents, guardians and law enforcement  
22 officials that CAIN was sexually molesting, harassing, and abusing minors; by failing to tell or  
23 concealing from Plaintiff's parents, guardians or law enforcement officials that she was sexually  
24 harassed, molested and abused after the CITY, LAPD and DOES 1 through 10 knew, or should have  
25 known, that CAIN "groomed" and sexually harassed, molested and abused Plaintiff, thereby allowing  
26 Plaintiff JANE MBQ DOE to be sexually harassed, sexually molested, and sexually abused by CAIN.  
27 The CITY, LAPD and DOES 1 through 10 cloaked within the facade of normalcy Officer CAIN's  
28 conduct and actions with the minor Plaintiff and disguised the nature of the sexual harassment,  
molestation and abuse and contact by Officer CAIN

1           39.     The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT and  
2 DOES 1 through 10, breached their duty to JANE MBQ DOE by, *inter alia*, failing to investigate or  
3 otherwise confirm such facts; failing to reveal such facts to her, the other police cadets and the  
4 community of the City of Los Angeles, placing and continuing to place CAIN in positions of trust and  
5 authority within the LAPD, and holding out, and continuing to hold out Officer CAIN to JANE MBQ  
6 DOE, the other police cadets, and the community, as being in good standing and trustworthy.

7           40.     The CITY OF LOS ANGELES, the LOS ANGELES POLICE DEPARTMENT, and  
8 DOES 1 through 10, breached their duty to JANE MBQ DOE by, *inter alia*, failing to adequately monitor  
9 and supervise Officer CAIN and by failing to stop him from committing wrongful sexual acts with  
10 minors, including Plaintiff JANE MBQ DOE.

11           41.     As a direct, legal and proximate result of the negligence of CITY and DOES 1-10,  
12 Plaintiff JANE MBQ DOE suffered childhood sexual abuse committed by Officer CAIN; and Plaintiff  
13 suffered emotional distress, and continues to suffer emotional distress; and Plaintiff has been emotionally  
14 injured as a result of the intentional and negligent conduct of Officer CAIN; and as a proximate result of  
15 the negligent training by the City of Los Angeles of its police officers, such as Officer CAIN by  
16 Defendant CITY OF LOS ANGELES.

17           42.     Defendant CITY OF LOS ANGELES is vicariously liable for the wrongful acts of Officer  
18 CAIN, and DOES 1 through 10 pursuant to section 815.2 of the California Government Code, which  
19 provides that a public entity is liable for the injuries caused by its employees within the scope of the  
20 employment if the employee's act would subject him or her to liability.

21           43.     As a result of Defendants' discriminatory acts acknowledged herein, Plaintiff is entitled to  
22 reasonable attorney's fees and costs of said suit as provided in Civil Code §51.7, and § 52.(b).

## 23                               **SECOND CLAIM FOR RELIEF**

### 24                               **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

25                               (Against All Defendants)

26           44.     Plaintiff re-alleges and incorporates by reference herein each and every allegation  
27 contained herein above as though fully set forth and brought in this cause of action.

28           45.     On or about January, 2017 through June, 2017, including June 14, 2017, Officer CAIN  
caused serious emotional injuries upon the minor Plaintiff by "grooming" and seducing Plaintiff, a minor

1 child; and CAIN knew that emotional distress was substantially certain to result from his conduct of  
2 "grooming" and seducing Plaintiff, ■ minor child. CAIN "groomed" Plaintiff with extreme attention,  
3 and lies of friendship and caring, and lies of romance and love with Plaintiff.

4 46. The conduct of the CITY OF LOS ANGELES, and DOES 1-10, in negligently supervising  
5 Officer CAIN in the Cadet program, was a reckless and negligent disregard of the probability of causing  
6 emotional distress of ■ minor Cadet, such as Plaintiff, who was "groomed" and seduced by CAIN. The  
7 CITY and DOES 1-10 knew there was a high degree of probability that emotional distress would result  
8 from CAIN's conduct of "grooming" and seducing Plaintiff, a minor child, with a conscious disregard of  
9 the probable results.

10 47. The CITY and DOES 1-10 engaged in negligent conduct in the supervision of CAIN and  
11 minor Plaintiff; and CAIN, an LAPD Officer/employee of Defendant CITY, engaged in a willful  
12 violation of Penal laws that prohibit lewd and lascivious acts with minors such ■ Plaintiff.

13 48. As a direct, legal and proximate result of the negligence of CITY, DOES 1-10, and CAIN,  
14 Plaintiff JANE MBQ DOE suffered serious emotional distress.

15 49. Defendant CITY and DOES 1-10 negligent conduct, and CAIN's willful violation of  
16 Penal laws that prohibit lewd and lascivious acts with minors such as Plaintiff was ■ proximate cause of  
17 Plaintiff's serious emotional distress. As ■ direct, legal and proximate result of Defendants' negligence,  
18 Plaintiff JANE MBQ DOE suffered severe emotional distress as a result of the conduct of the Defendants  
19 and Officer CAIN, including but not limited to wrongfully "grooming" and seducing Plaintiff; and  
20 coercing, intimidating, committing lewd acts, and sexually assaulting Plaintiff JANE MBQ DOE.

21 50. As ■ proximate result, Plaintiff JANE MBQ DOE has suffered and continues to suffer,  
22 pain, suffering, embarrassment, humiliation, and emotional distress, in an amount according to proof.

### 23 **THIRD CLAIM FOR RELIEF**

#### 24 **SEXUAL HARASSMENT: CIVIL CODE § 51.9**

25 (Against All Defendants)

26 51. Plaintiff re-alleges and incorporates by reference herein each and every allegation  
27 contained herein above as though fully set forth and brought in this cause of action.

28 52. The Defendant CITY OF LOS ANGELES, and DOES 1-10, had ■ professional  
relationship with Plaintiff JANE MBQ DOE, specifically that Plaintiff was in the Cadet Program of the

1 Los Angeles Police Department at the 77<sup>th</sup> Street Division. CAIN's employment duties and  
2 responsibilities with the Defendant CITY and DOES 1-10 included, inter alia, providing of the  
3 supervision, advisory, education, and training needs and well-being of minor Cadets participating in the  
4 Los Angeles Police Department Cadet Program at the 77<sup>th</sup> Street Division of the Los Angeles Police  
5 Department, including Plaintiff JANE MBQ DOE.

6 53. Officer CAIN was in charge of Plaintiff's supervision as an advisor, and in Plaintiff's  
7 education and training as an LAPD Cadet. While Plaintiff JANE MBQ DOE was a Los Angeles Police  
8 Department Cadet, CAIN made sexual advances, solicitations, requests, demands for sexual compliance,  
9 of a hostile nature to JANE MBQ DOE and/or engaged in other verbal, visual, or physical conduct of a  
10 sexual nature and/or of a hostile nature based on her gender, that were unwelcome, pervasive, and severe,  
11 as described above, which were done for CAIN'S sexual gratification, all while he was acting in the  
12 course and scope of his employment with Defendants, and each of them, to exploit Plaintiff JANE MBQ  
13 DOE physically, psychologically, and emotionally.

14 54. These incidents of abuse took place while Plaintiff JANE MBQ DOE was under the  
15 control of CAIN, in his capacity and position as an LAPD Officer, counselor, advisor, and trainer and  
16 CAIN used his authority and position of trust to exploit Plaintiff physically and emotionally. These acts  
17 were done for CAIN'S sexual gratification all while CAIN was acting in the course and scope of his  
18 agency/employment within the CITY and the LAPD.

19 55. Because of CAIN'S position of authority over Plaintiff JANE MBQ DOE and her young  
20 age, among other things, Plaintiff was unable to terminate the relationship with CAIN. Even though  
21 Defendant CITY and DOES 1-10 knew, or should have known, of the unlawful activities that CAIN  
22 committed with Plaintiff. Defendants CITY and DOES 1-10 did nothing to investigate, supervise, or  
23 monitor CAIN to ensure the safety of Plaintiff and permitted CAIN to keep working as a police officer  
24 and advisor to the Cadet Program. Defendant CITY and DOES 1-10 ratified the sexual misconduct of  
25 CAIN by permitting CAIN to continue working after they knew of, or had the opportunity to learn of,  
26 CAIN'S misconduct. Here, the tortuous conduct that violated CAIN'S official duties were within the  
27 scope of his employment with the CITY OF LOS ANGELES. Plaintiff JANE MBQ DOE will suffer  
28 economic loss and/or disadvantage, and personal injuries, including emotional distress as a result of  
CAIN'S conduct, and as a result of the negligent conduct of the CITY OF LOS ANGELES, and DOES

1 1-10, in negligently supervising Officer CAIN in the Cadet program. The CITY and DOES 1-10 were  
2 reckless and negligently disregarded the probability of causing emotional distress of ■ minor Cadet, such  
3 as Plaintiff.

4 56. Defendant CITY and their employees and agents, including but not limited to DOES 1  
5 through 10, in the aforementioned acts and/or omissions, ■ described above, were a breach of their  
6 duties to Plaintiff JANE MBQ DOE and the proximate cause of her damages as alleged herein.

7  
8 **FOURTH CLAIM FOR RELIEF**

9 **Violation of Ralph Act, Cal. Civil Code § 51.7, and violation of the Bane Civil Rights Act 52.1.**

10 (Against All Defendants)

11 57. Plaintiff re-alleges and incorporates by reference herein each and every allegation  
12 contained herein above as though fully set forth and brought in this cause of action.

13 53. The Ralph Civil Rights Act, California Civil Code, Section 51.7, and the Bane Civil Rights  
14 Act, section 52.1, applies to this complaint because of the intentional acts and omissions of the CITY OF  
15 LOS ANGELES, and DOES 1-10, and Officer CAIN, an employee of the CITY of LOS ANGELES.

16 54. Officer CAIN intentionally interfered with, or attempted to interfere with, the civil rights of  
17 Plaintiff, and the right of freedom of movement by unlawfully coercing, intimidating, and committing  
18 lewd acts upon Plaintiff JANE MBQ DOE and sexually assaulting Plaintiff.

19 55. Plaintiff reasonably believed that Officer CAIN would commit additional lawful misconduct  
20 against her.

21 56. Officer CAIN injured Plaintiff to prevent Plaintiff from exercising her right of freedom of  
22 movement.

23 57. Plaintiff is informed and believes and that the conduct of Officer CAIN and each Defendant  
24 in doing and failing to do other wrongful acts herein alleged, was motivated by their invidious racial,  
25 ethnic, class and/or other animus and for that reason violated Plaintiff's rights under California Civil  
26 Code Sections 51.7 and 52.1.

27 //

28 //

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury.

Dated: May 1, 2018

CARRILLO LAW FIRM, LLP

By: 

Luis A. Carrillo, Counsel for Plaintiff



1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff requests entry of judgment in her favor and against Defendants CITY  
3 OF LOS ANGELES, and DOES 1-10, inclusive, as follows:

- 4 A. General, special, and economic damages in an amount ~~as~~ proved:  
5 B. Damages under Civil Code §52, §3294;  
6 C. Damages for emotional distress;  
7 D. For reasonable costs of this suit and attorneys' fees pursuant to Civil Code 52(b);  
8 E. For such further other relief as the Court may deem just, proper, and appropriate.

9  
10 DATED: May 1, 2018

CARRILLO LAW FIRM, LLP

11  
12  
13 By 

14 Luis A. Carrillo  
Attorney for Plaintiff

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, SBN number, and address):  
LUIS A. CARRILLO, SBN 70398/Michael S. Carrillo, SBN 258878  
CARRILLO LAW FIRM, LLP  
1499 HUNTINGTON DR., STE 402  
SOUTH PASADENA CALIFORNIA 91030  
TELEPHONE NO.: (626)799-9375 FAX NO.: (626)799-9380  
ATTORNEY FOR (Name): Plaintiff Jane B.Q. Doe

FOR COURT USE ONLY  
**FILED**  
Superior Court of California  
County of Los Angeles

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 NORTH HILL STREET  
MAILING ADDRESS: SAME  
CITY AND ZIP CODE: LOS ANGELES CALIFORNIA 90012  
BRANCH NAME: Central District

MAY 02 2018  
Sherril K. Lister, Executive Officer/Clerk of Court  
By [Signature], Deputy  
Christoffer Robinson

CASE NAME:  
Jane MBQ Doe, a minor vs. City of Los Angeles, et. al.

**CIVIL CASE COVER SHEET**  
☒ **Unlimited**  
(Amount demanded exceeds \$25,000)  
☐ **Limited**  
(Amount demanded is \$25,000 or less)

**Complex Case Designation**  
☐ **Counter** ☐ **Joinder**  
Filed with first appearance by defendant  
(Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC 7 0 4 4 6 5**  
JUDGE:  
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the ☒ type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation</b> (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
---	--	---

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify):
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: May 1, 2018  
Luis A. Carrillo, Esq.

(TYPE OR PRINT NAME)

**NOTICE**

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

## Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

## Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (not asbestos or toxic/environmental) (24)  
Medical Malpractice (45)  
Medical Malpractice—Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

## Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (not medical or legal)  
Other Non-PI/PD/WD Tort (35)

## Employment

Wrongful Termination (36)  
Other Employment (15)

## Contract

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract (not unlawful detainer or wrongful eviction)  
Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (not provisionally complex) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

## Real Property

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

## Unlawful Detainer

Commercial (31)  
Residential (32)  
Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

## Judicial Review

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor Commissioner Appeals

## Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

## Enforcement of Judgment

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (non-domestic relations)  
Sister State Judgment  
Administrative Agency Award (not unpaid taxes)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Cases

## Miscellaneous Civil Complaint

RICO (27)  
Other Complaint (not specified above) (42)  
Declaratory Relief Only  
Injunctive Relief Only (non-harassment)  
Mechanics Lien  
Other Commercial Complaint Case (non-tort/non-complex)  
Other Civil Complaint (non-tort/non-complex)

## Miscellaneous Civil Petition

Partnership and Corporate Governance (21)  
Other Petition (not specified above) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition

SHORT TITLE:

Jane MBQ Doe, a minor vs. City of Los Angeles, et. al.

CASE NUMBER

ORIGINAL

**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

**Item I.** Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 5 ☐ HOURS/ ☒ DAYS

**Item II.** Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

- |   |   |
|---|---|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district.<br>2. May be filed in central (other county, or no bodily injury/property damage).<br>3. Location where cause of action arose.<br>4. Location where bodily injury, death or damage occurred.<br>5. Location where performance required or defendant resides. | 6. Location of property or permanently garaged vehicle.<br>7. Location where petitioner resides.<br>8. Location wherein defendant/respondent functions wholly.<br>9. Location where one or more of the parties reside.<br>10. Location of Labor Commissioner Office |
|---|---|

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
<b>Other Personal Injury/ Property Damage/ Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input checked="" type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 4. 1., 4. 1., 3. 1., 4.

SHORT TITLE: Jane MBQ Doe, a minor vs. City of Los Angeles, et. al.	CASE NUMBER
--	-------------

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels_____	2.
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE: Jane MBQ Doe, a minor vs. City of Los Angeles, et. al.	CASE NUMBER
---	-------------

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Jane MBQ Doe, a minor vs. City of Los Angeles, et. al.	CASE NUMBER
--	-------------

**Item III. Statement of Location:** Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., **Step 3** on Page 1, as the proper reason for filing in the court location you selected.

<b>REASON:</b> Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.  <input checked="" type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 7600 S Broadway
CITY: Los Angeles	STATE: CA	ZIP CODE: 90003	

**Item IV. Declaration of Assignment:** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Los Angeles courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: 5/1/2018

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION